

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC.,  
RENTAL SOFTWARE ANTITRUST  
LITIGATION (NO. II)** )      **Case No. 3:23-md-3071**  
                                )      **MDL No. 3071**  
                                )      **Judge Waverly D. Crenshaw, Jr.**  
                                )  
                                )      **This Document Relates to:**  
                                )      **3:23-cv-00326**  
                                )      **3:23-cv-00330**  
                                )      **3:23-cv-00339**  
                                )      **3:23-cv-00389**  
                                )      **3:23-cv-00414**  
                                )      **3:23-cv-00440**  
                                )

**JOINT MOTION TO SUBSTITUTE COUNSEL OF RECORD**

Pursuant to Local Rule 83.01(g) of the Local Rules of Court for the United States District Court for the Middle District of Tennessee, Defendant Prometheus Real Estate Group, Inc. (“Prometheus”) moves to substitute counsel of record in the matters listed above and states as follows:

1. Prometheus is presently represented in this matter by attorney Michael W. Droke of the law firm Dorsey & Whitney LLP, and attorneys Heather T. Rankie and Judith A. Zahid of the law firm Zelle LLP.
2. Michael W. Droke of Dorsey & Whitney LLP was local counsel for Prometheus in the above-captioned case *Morgan, et al. v. RealPage, Inc., et al.* while it was before the United States District Court for the Western District of Washington. Heather T. Rankie and Judith A. Zahid of Zelle LLP were admitted *pro hac vice* by that court and remain as counsel of record for Prometheus.

3. Because the Western District of Washington matters have been transferred to this Court, Prometheus requests to allow its counsel Dorsey & Whitney LLP to withdraw.
4. Prometheus requests to substitute as its attorneys in these matters Heather T. Rankie and Judith A. Zahid of Zelle LLP.

WHEREFORE, premises considered, Prometheus requests that this Court grant its motion to substitute counsel, allowing attorneys Heather T. Rankie and Judith A. Zahid of Zelle LLP to continue to act as counsel for Prometheus, and allowing attorney Michael W. Droke of Dorsey & Whitney LLP to withdraw as counsel in this matter.

DATED this 14th day of July, 2023

Respectfully submitted,

/s/ Heather T. Rankie  
Heather T. Rankie (*Pro Hac Vice*)  
Judith A. Zahid (*Pro Hac Vice*)  
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*Substituting Attorneys for Prometheus Real Estate Group, Inc.*

/s/ Michael W. Droke  
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*Withdrawing Attorneys for Prometheus Real Estate Group, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2023, I electronically filed a copy of the foregoing with the Clerk of the District Court using the CM/ECF system, which will send notification of such filing to all parties registered with the Court's electronic filing system.

/s/ Heather T. Rankie  
Heather T. Rankie